

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                    |   |                      |
|------------------------------------|---|----------------------|
| POWER INTEGRATIONS, INC.,          | ) |                      |
|                                    | ) |                      |
| Plaintiff,                         | ) |                      |
|                                    | ) |                      |
| v.                                 | ) | C.A. No. 04-1371-JJF |
|                                    | ) |                      |
| FAIRCHILD SEMICONDUCTOR            | ) |                      |
| INTERNATIONAL, INC., and FAIRCHILD | ) |                      |
| SEMICONDUCTOR CORPORATION,         | ) |                      |
|                                    | ) |                      |
| Defendants.                        | ) |                      |

**NOTICE OF PRIOR ART PURSUANT TO 35 U.S.C. SECTION 282**

PLEASE TAKE NOTICE, pursuant to 35 U.S.C. Section 282, that the following will be relied upon to support Fairchild Semiconductor International , Inc and Fairchild Semiconductor Corporation ( Fairchild ) that United States Patents Nos. 4,811,075 ('075 patent); 6,107,851 ('851 patent); 6,229,366, ('366 patent); and 6,249, 876 ('876 patent) are invalid because they were invented by another, anticipated, and obvious.

**A. Patents**

1. United States Patent Number 5,631,920, Spread Spectrum Clock Generator, K. Hardin, Issued May 20, 1997 (produced as Bates Nos. FCS0527468-78) was published as of May 20, 1997.
2. United States Patent Number 4,507,796, Electronic Apparatus Having Low Radio Frequency Interference From System Clock Signal, D. Stumfall, Issued March 26, 1985 (produced as Bates Nos. FCS1688159-65) was published as of March 26, 1985.
3. United States Patent Number 4,638,417, Power Density Spectrum Controller, H. Martin, G. Hitler & D. Parsley, Issued January 20, 1987 (produced as Bates Nos. FCS0525445-8) was published as of January 20, 1987.
4. United States Patent Number 5,498,995, Short Circuit Frequency Shift Circuit for Switching Regulators, T. Szepesi & H. Santo, Issued March 12, 1996) (produced as Bates Nos. FCS0524804-20) was published as of March 12, 1996.
5. United States Patent Number 5,555,168, Frequency Modulated Switching Power Supply, B. Ferrario, Issued September 10, 1996 (produced as Bates Nos. FCS0524821-6) was published as of September 10, 1996.

6. United States Patent Number 4,626,879, Lateral Double Diffused MOS Transistor Devices Suitable for Source-Follower Applications, S. Colak, Issued December 2, 1986 (produced as Bates Nos. FCS0000526-32; FCS0526662-8) was published as of December 2, 1986.
7. United States Patent Number 6,005,444, Circuits For Producing Control Currents For a Current Controlled Oscillator, Carpelan, Issued December 21, 1999 (produced as Bates Nos. FCS1691477-98) was published as of December 21, 1999.
8. United States Patent Number 5,604,465, Adaptive Self-Calibration For Fast Tuning Phaselock Loops, Farabaugh, Issued February 18, 1997 (produced as Bates Nos. FCS1691499-509) was published as of February 18, 1997.
9. United States Patent Number 4,283,236, Method of Fabricating Lateral PNP Transistors Utilizing Selective Diffusion And Counter Doping, R. Sirsi, Issued August 11, 1981 (produced as trial exhibit DX193) was published as of August 11, 1981.
10. United States Patent Number 4,823,173 J. Beasom, Issued April 18, 1989 (produced as Bates Nos. FCS0525249-56) was published as of April 18, 1989.
11. Application for U.S. Patent No. 4,823,173 filed January 7, 1986 (produced as Bates Nos. FCS1688778-FCS168899)
12. United States Patent Number 5,264,719, J. Beasom, Issued November 23, 1993 (produced as Bates Nos. FCS0525257-FCS0525272) was published as of November 23, 1993.
13. Application for U.S. Patent No. 5,264,719 filed May 24, 1991, priority to January 7, 1986. (produced as Bates Nos. FCS1688900-FCS1689178)
14. United States Patent Number 4,394,674, H. Sakuma, T. Suzuki, filed October 9, 1980, priority to Oct. 9, 1979 (produced as Bates Nos. FCS1693654-FCS1693667)
15. United States Patent Number 4,422,089, H. M. J. Vaes, J.A. Appels, A. W. Ludikhuize, filed December 22, 1980, priority to September 8, 1980 (produced as Bates Nos. FCS1693668-FCS1693681)
16. United States Patent Number 4,270,137, D. Coe, filed December 15, 1978, priority to December 15, 1977 (produced as Bates Nos. FCS1693682-FCS1693691)
17. United States Patent Number 4,300,150, S. Colak, filed June 16, 1980 (produced as Bates Nos. FCS1693692-FCS1693696)
18. United States Patent Number 4,344,080, J. Tihanyi, filed December 3, 1979, priority to December 5, 1978 (produced as Bates Nos. FCS1693697-FCS1693704)

19. United States Patent Number 4,409,606, K. Wagenaar, H. C. De Graaff, J. A. Appels, filed January 8, 1981, priority to March 10, 1980 (produced as Bates Nos. FCS1693705-FCS1693712)

20. United States Patent Number 4,485,392, B. Singer, filed December 28, 1981 (produced as Bates Nos. FCS1693713-FCS1693718)

**B. Publications (reference is to all pages unless otherwise indicated)**

21. A. C. Wang & S. R. Sanders, Programmed Pulsewidth Modulated Waveforms for Electromagnetic Interference Mitigation in DC-DC Converters, IEEE Transactions on Power Electronics, Vol. 8, No. 4, pp. 596 – 605 (Oct. 1993) (produced as Bates Nos. FCS0000516-25; FCS0524402-11; FCS0525273-82; FCS0527640-FCS0527643) was published as of October, 1993.

22. F. J. De Stasi & T. Szepesi, A 5A 100KHz Monolithic Bipolar DC/DC Converter, The European Power Electronics Association, pp. 201 – 208 (1993) (produced as Bates Nos. FCS0524438-45) was published as of 1993.

23. B. Andreycak, The UC3823A, B and UC3825A, B Enhanced Generation of PWM Controllers, Unitrode Application Note U-128 (1994) (produced as Bates Nos. FCS0524551-59) was published as of 1994 .

24. Toko, Power Conversion IC Data Book TK75001, pp. 3-1 – 3-12 (1996) (produced as Bates Nos. FCS0002173-85; FCS0524981-92; FCS0525246-48 (figures only); FCS0002145-53) was published as of 1996.

25. National Semiconductor, Power ICs Databook, LM2577, 2587, pp. 3-60 – 3-139 (1995) (produced as Bates Nos. FCS0524993-5038) was published as of 1995.

26. National Semiconductor, LM2671, pp. 1-22 (Aug. 1997) (produced as Bates Nos. FCS0002451-76; FCS0525161-86; FCS0527249-70) was published as of August, 1997.

27. Motorola, Analog/Interface ICs Databook, MC34023, Vol. 1, pp. 3-247 – 3-262 (1995) (produced as Bates Nos. FCS0001324-42; FCS0002154-72; FCS0525239-45; FCS0527069-85) was published as of 1995.

28. T. Habetler & D. Divan, Acoustic Noise Reduction in Sinusoidal PWM Drives Using a Randomly Modulated Carrier, IEEE Transactions on Power Electronics, Vol. 6, No. 3, pp. 356 – 363 (Jul. 1991) (produced as Bates Nos. FCS0000508-15; FCS0528052-60; FCS052583-90) was published as of July, 1991.

29. Philips Semiconductors, GreenChip SMPS Control IC, TEA1504 (Mar. 17, 1998) (produced as Bates Nos. FCS0525319-38; FCS0526984-98) was published as of March 17, 1998.

30. Motorola, High Speed Double -Ended PWM Controller, MC34025, MC33025 (1993) (produced as Bates Nos. FCS0525640-66; FCS0527097-99; FCS1686752-4) was published as of 1993.

31. Motorola, High Performance Resonant Mode Controller, MC34067, MC33067 (produced as Bates Nos. FCS0525631-FCS0525639, FCS0527094-FCS0527096, FCS1686749-FCS1686751) was published as of 1996.
32. Maxim, 5V –to –3.3V, Synchronous, Step –Down Power –Supply Controller, MAX767 (May 1994) (produced as Bates Nos. FCS0525696-98; FCS0527050-64; FCS0525699-703) was published as of May, 1994.
33. Maxim, Dual –Output Power –Supply Controller for Notebook Computers, MAX786 (May 1994) (produced as Bates Nos. FCS0525738-45; FCS0527045-9) was published as of May, 1994.
34. Maxim, 5V/3.3V/3V 5A Step –Down, PWM, Switch –Mode DC –DC Regulators, MAX796 –MAX799 (Nov. 1, 1994) (produced as Bates No. FCS0525749) was published as of November 1, 1994.
35. Maxim, 1996 New Releases Data Book Volume 5 (1996) (produced as Bates Nos. FCS1692097-FCS1692103, FCS1686847-FCS1686851, FCS0527065-FCS0527068) was published as of 1996.
36. F. Goodenough, Off –Line PWM Switching Regulator IC Handles 3W, Electronic Design (Mar. 22, 1990) (produced as Bates Nos. FCS0525776-9; FCS0528084-9) was published as of March 22, 1990.
37. R. Frank, et. al., LM3001/LM3101 A 1 MHz Off –Line PWM Controller Chipset with Pulse Communication for Voltage –Current – or Charge – Mode Control, AN –918, National Semiconductor (Jan. 1994) (produced as Bates Nos. FCS0525786-93; FCS0527208-15) was published as of January, 1994.
38. National Semiconductor, Power ICs Databook, LM3101 Secondary –Side PWM Controller, (produced as Bates Nos. FCS1686682-FCS1686698) was published as of 1993.
39. National Semiconductor, LM2587 Simple Switcher 5A Flyback Regulator, Power ICs Databook 1995:3-116-3-139 (produced as FCS0001365-FCS0001388, FCS0002208-FCS0002231, FCS0525108-FCS0525131, FCS1691929-FCS1691939, FCS1691962-FCS1691985) was published as of 1995.
40. National Semiconductor, LM2587 Simple Switcher 5A Flyback Regulator, Power ICs Databook 1995:3-116-3-139 (produced as FCS0526842-FCS0526867, FCS1686845-FCS1686846) was published as of March 1996.
41. National Semiconductor, LM2588 SIMPLE SWITCHER 5A Flyback Regulator with Shutdown (Mar. 1996) (produced as Bates Nos. FCS0526814-41) was published as of March, 1996.
42. National Semiconductor, LM1577/LM2577 SIMPLE SWITCHER Step Up Voltage Regulator, Power IC's Databook, pp. 3-80 – 3-101 (1995) (produced as Bates Nos. FCS0001343-64; FCS0002186-207; FCS0526903-10) was published as of 1995.

43. Linear Technology, LTC1435 High Efficiency Low Noise Synchronous Step –Down Switcher Regulator, pp. 4-212 – 4-225 (1996) (produced as Bates Nos. FCS0527031-44; FCS1686809-22) was published as of 1996.
44. Linear Technology, LTC1553 5 –Bit Programmable Synchronous Switching Regulator Controller for Pentium Pro Processor, pp. 4-289 – 4-305 (Feb. 1997) (produced as Bates Nos. FCS0527100-16; FCS1686780-96) was published as of February, 1997.
45. Linear Technology, LTC1504 500mA Low Voltage Step –Down Synchronous Switching Regulator, pp. 4-257 – 4-268 (1996) (produced as Bates Nos. FCS0527117-28; FCS1686797-808) was published as of 1996.
46. Unitrode Integrated Circuits, UC1823A,B/1825A,B, UC2823A,B/2825A,B, UC3823A,B/3825A,B, pp. 5-119 – 5-126 (June 1993) (produced as Bates Nos. FCS0527155-62) was published as of June, 1993.
47. Unitrode Integrated Circuits, UC1823, UC2823, UC3823 High Speed PWM Controller, pp. 5-113 – 5-118 (June 1993) (produced as Bates Nos. FCS0527200-7; FCS1686852-7) was published as of June, 1993.
48. Cherry Semiconductor, Enhanced Current Mode PWM Controller with SYNC, CS –51021/51023, pp. 91 – 98 (Feb. 20, 1997) (produced as Bates Nos. FCS0527221-8; FCS1686772-9) was published as of February 20, 1997.
49. National Semiconductor, LM2672 SIMPLE SWITCHER Power converter High Efficiency 1A Step Down Voltage Regulator with Features, pp. 1 – 6 (Apr. 1997) (produced as Bates Nos. FCS0527243-8) was published as of April, 1997.
50. National Semiconductor, LM2597 SIMPLE SWITCHER Power Converter, pp. 1-28 – 1-34 (1995) (produced as Bates Nos. FCS0527271-98; FCS0002417-50) was published as of 1995.
51. Unitrode Integrated Circuits, UNITRODE u –128, Application note, the UC3823A,B and UC3825A,B Enhanced Generation of PWM Controllers, pp. 10-228 – 10-236 (1994) (produced as Bates Nos. FCS0527322-30; FCS1686710-8) was published as of 1994.
52. Unitrode Integrated Circuits, UCC 3800/1/2/3/4/5 biCMOS CURRENT MODE CONTROL IC's (U –133), pp. 9-344 – 9-362 (1994) (produced as Bates Nos. FCS0527413-31; FCS1686719-36) was published as of 1994.
53. Unitrode Integrated Circuits, UCC1810, UCC2810, UCC3810 Low Power BiCMOS Dual Current Mode PWM, pp. 6-145 – 6-151 (Dec. 1994) (produced as Bates Nos. FCS0527440-6; FCS1686703-9) was published as of December, 1994.
54. P. Horowitz & I. Robinson, Laboratory Manual for The Art of Electronics, pp. 17-1 – 17-3 (Aug. 6, 1981) (produced as Bates Nos. FCS0527486-90; FCS1686642-6) was published as of August 6, 1981.

55. National Semiconductor, LM3001 Primary-Side PWM Driver, pp. 3-140 – 3-159 (1995) (produced as Bates Nos. FCS0527129-48; FCS1686823-42) was published as of 1995.
56. SGS-Thompson, TEA2262, Switch Mode Power Supply Controller, pp. 1 – 9 (Apr. 1996) (produced as Bates Nos. FCS1686647-55) was published as of April, 1996.
57. C. Hoekstra, Frequency Modulation of System Clocks for EMI Reduction, Hewlett-Packard Journal Article 13, pp. 1 – 7 (Aug. 1997) (produced as Bates Nos. FCS1686656-62) was published as of August, 1997.
58. Unitrode Integrated Circuits, UC1823, UC2823, UC3823 High Speed PWM Controller (Jun. 1993) (produced as Bates Nos. FCS0527200-7; FCS1686852-7) was published as of June, 1993.
59. Unitrode Integrated Circuits, UC1875/6/7/8, UC2875/6/7/8, UC3875/6/7/8 Phase Shift Resonance Controller (May 1993) (produced as Bates Nos. FCS0527191-9) was published as of May, 1993.
60. Unitrode Integrated Circuits, UCC1800/1/2/3/4/5, UCC2800/1/2/3/4/5, UCC3800/1/2/3/4/5, Low-Power BiCMOS Current-Mode PWM (May 1993) (produced as Bates Nos. FCS0527432-35; FCS1686737-40) was published as of May, 1993.
61. Unitrode Integrated Circuits, UCC1807-1/-2/-3, UCC2807-1/-2/-3, UCC3807-1/-2/-3 Low Power BiCMOS Current Mode PWM (Jan. 1995) (produced as Bates Nos. FCS0527436-9; FCS0527457-8; FCS1686699-702) was published as of January, 1995.
62. National Semiconductor, Data Acquisition Databook (1995) (produced as Bates Nos. FCS0527453-5) was published as of 1995.
63. Unitrode Integrated Circuits, UC1828, 2828, 3828, 1840, 2840, 3840, 1841, 2841, 3841, 1848, 2848, 3848, 1851, 2851, 3851, 1854, 2854, 3854, 1874-1, -2, 2874-1, -2, 3874-1, -2, Unitrode Current Mode PWM Controller IC (Nov. 1994) (produced as Bates Nos. FCS0527459-67) was published as of November, 1994.
64. U. Tietze & Ch. Schenk, Advanced Electronic Circuits (1978) (produced as Bates Nos. FCS0527482-5) was published as of 1978.
65. D. Sheingold, Analog Digital Conversion Handbook, Prentice Hall, pp. 124-126 (1986) (produced as Bates Nos. FCS0527491-5) was published as of 1986.
66. Unitrode Integrated Circuits, Unitrode Resonant Mode Power Supply Controller UC1860, 2860, 3860 (Oct. 1993) (produced as Bates Nos. FCS0527308-15) was published as of October, 1993.
67. SGS-Thompson, TEA2260, TEA2261 Switch Mode Power Supply Controller (Jun. 2, 1992) (produced as Bates Nos. FCS1687336-44) was published as of June 2, 1992.

68. SGS-Thompson, Application Note: TEA2260, TEA2261 High Performance Driver Circuits for S.M.P.S., Application Note AN376 (Jun. 1994) (produced as Bates Nos. FCS1687345-78) was published as of June, 1994.
69. S. Sze, Physics of Semiconductor Devices, pp. 431-438, 486-491 (1981) (produced as Bates Nos. FCS0000543-58) was published as of 1981.
70. M. Pocha, Tradeoff Between Threshold Voltage and Breakdown in High-Voltage Double-Diffused MOS Transistors, IEEE Transactions On Electron Devices, Vol. ED-25, No. 11, pp. 1325-1327 (Nov. 1978) (produced as Bates Nos. FCS1689179-81) was published as of November, 1978.
71. Z. Parpia, A Novel CMOS-Compatible High-Voltage Transistor Structure, IEEE Transactions on Electron Devices, Vol. ED-33, No. 12, pp. 1948-1952 (Dec. 1986) (produced as Bates Nos. FCS1689182-6) was published as of December, 1986.
72. H. Wakaumi, A Highly Reliable 16 Output High Voltage NMOS/CMOS Logic IC With Shielded Source Structure, IEDM 83, pp. 416-419 (1983) (produced as Bates Nos. FCS1689187-92) was published as of 1983.
73. A. Ludikhuiize, High-Voltage DMOS and PMOS in Analog IC's, IEDM 82, pp. 81-84 (1982) (produced as Bates Nos. FCS1689193-6) was published as of 1982.
74. Unitrode Integrated Circuits, UC1827-1/-2, UCC2827-1/-2, UCC3827-1/-2 Buck Current/Voltage Fed Push-Pull PWM Controllers (Mar. 1998) (produced as Bates Nos. FCS0527216-20) was published as of March, 1998.
75. I. Wacyk, M. Amato & V. Rummennick, A Power IC with CMOS Analog Control (1986) (produced as Bates Nos. FCS1689202-3) was published as of 1986.
76. M. Amato & V. Rumennick, Comparison of Lateral and Vertical DMOS Specific On-Resistance, IEDM 85, pp. 736-739 (1985) (produced as Bates Nos. MS 01369-MS01372) was published as of 1985.
77. S. Sun, Physics and Technology of Power MOSFETS (Dissertation) (1982) (produced as Bates Nos. FCS1689204-436) was published as of 1982.
78. LDMOS powerpoint, Uppsala Universitet (produced as Bates No. MS01373)
79. P. Horowitz & W. Hill, The Art of Electronics, 2nd Ed., pg. 624 (1989) (produced as Bates Nos. FCS0527450-2) was published as of 1989.
80. Unitrode Integrated Circuits, Application Note for U-100A: The UC3842/3/4/5 Series of Current-Mode PWM IC's (Jun. 1993) (produced as Bates Nos. FCS1688283-4; FCS1691458-9) was published as of June, 1993.

81. Unitrode Integrated Circuits, Application Note for U-96A: A 25 Watt Off-Line Flyback Switching Regulator (Jun. 1993) (produced as Bates Nos. FCS1688295-9; FCS1691458-9) was published as of June, 1993.
82. R. Keller, Power Integrations, Off-Line Power Integrated Circuit for International Rated 60-Watt Power Supplies, (Feb. 23-27, 1992) (produced as Bates Nos. FCS0524577-84; FCS0527805-14) was published as of February 27, 1992.
83. Power Integrations, PWR-SMP240 PWM Power Supply IC 85-265 VAC Input Isolated, Regulated DC Output (Feb. 1992) (produced as Bates Nos. FCS1685819-31, PIF129895-PIF129910) was published as of February, 1992.
84. Power Integrations, Application Note AN-11: Function and Application of the PWR-SMP240/260 (Mar. 1992) (produced as Bates Nos. PIF 131267-82) was published as of March, 1992.
85. Power Integrations, Design Aid DA-5: Charging Batteries with the PWR-SMP260 (Mar. 1992) (produced as Bates Nos. PIF 131293-9) was published as of March, 1992.
86. Power Integrations, PWR-EVAL8: PWR-SMP240 Evaluation Board 110/220 VAC Input Isolated 5/12V, 20W (Total) Output (Feb. 1992) (produced as Bates Nos. PIF 131229-46) was published as of February, 1992.
87. Power Integrations, PWR-SMP260 PWM Power Supply IC 85-265 VAC Input Isolated, Regulated DC Output (Feb. 1992) (produced as Bates Nos. FCS1685806-18, PIF129879-PIF129894) was published as of February, 1992.
88. Power Integrations, PWR-SMP260 PWM Power Supply IC 85-265 VAC Input Isolated, Regulated DC Output (Nov. 1991) (produced as Bates Nos. PIF129911-PIF129918) was published as of November, 1991.
89. Power Integrations, PWR-SMP240 PWM Power Supply IC 85-265 VAC Input Isolated, Regulated DC Output (Nov. 1991) (produced as Bates Nos. PIF129930-PIF129937) was published as of November, 1991.
90. Power Integrations, 1-Watt Buck Regulator IC – 20-72 VDC Input Non-insolated DC Output, SMP402 (Jan. 1996) (produced as Bates Nos. FCS0525806-21; FCS0527351-68) was published as of January, 1996.
91. Power Integrations, SMP211 PWM Power Supply IC 85-265 VAC Input Isolated, Regulated DC Output (Jan. 1996) (produced as Bates Nos. FCS1686663-81; FCS1685478-96) was published as of January, 1996.
92. Power Integrations, PWR-SMP212 PWM Power Supply IC 85-265 VAC Input Isolated, Regulated DC Output (Feb. 1992) (produced as Bates Nos. PIF129690-PIF129705) was published as of February, 1992.

93. Power Integrations, PWR-SMP3 PWM Power Supply IC 120 VAC Input (Jul. 1991) (produced as Bates Nos. FCS1687321-30) was published as of July, 1991.
94. Power Integrations, Application Note AN-6: Designing Power Supplies with PWR-SMP3 (Jul. 1991) (produced as Bates Nos. PIF 131247-66) was published as of July, 1991.
95. Power Integrations, PWR-EVAL1: PWR-SMP3 Evaluation Board 110 VAC Input Isolated 5V, 5W Output (Mar. 1992) (produced as Bates Nos. PIF 131195-210) was published as of March, 1992.
96. Power Integrations, PWR-EVAL7: PWR-SMP260 Evaluation Board 110/220 VAC Input Isolated 5/12V, 30W (Total) Output (Mar. 1992) (produced as Bates Nos. PIF 131211-28) was published as of March, 1992.
97. Power Integrations, PWR-SMP260 PWM Power Supply IC 110/220 VAC Input Isolated, Regulated DC Output (Aug. 1991) (produced as Bates Nos. PIF129919-PIF129929) was published as of August, 1991.
98. Power Integrations, PWR-SMP260 Design Specification, Rev. 2 (Jul. 12, 1991) (produced as Bates Nos. PIF 129993-5) was published as of July 12, 1991.
99. Power Integrations, Design Schematic PS07, (sheets 1-28) (1990-1991) (produced as Bates Nos. PIF129750-77) was published as of 1991.
100. Power Integrations, Design Schematic PS03 (Feb. 27-28, 1990) (produced as Bates Nos. PIF129301-21) was published as of February 28, 1990.
101. Power Integrations, Design Schematic PS10, (sheets 1-30) (1990-1992) (produced as Bates Nos. PIF129454-84) was published as of 1992.
102. Chet Chesher, Crystal Oscillator Reduces EMI from Computers, Spread Spectrum Oscillators Released (July 4, 1997) (produced as Bates Nos. FCS1686639-FCS1686641) was published as of July 4, 1997.
103. Ashok Bindra, Power-Conversion Chip Cuts Energy Wastage in Off-Line Switchers, Electronic Design (Oct 1, 1998) (produced as Bates Nos. FCS0000506-FCS0000507) was published as of October 1, 1998.
104. James D. Plummer, Monolithic MOS High Voltage Integrated Circuits, IEDM 80, pp. 70-74 (1980) (documents produced as Bates Nos. FCS0526740-FCS0526745)
105. Katsumasa Fujii, Yasuo Torimaru, Kiyotoshi Nakagawa, Takeo Fujimoto & Yoshimasa Aoki, Session III: Solid-State Devices WAM 3.6: 400V MOS IC for EL Display, ISSCC 81, pp. 46-47 (February 18, 1981)
106. Tadanori Yamaguchi & Seiichi Morimoto, Process And Device Design Of A 1000-Volt MOS IC, IEDM 81, pp. 255-258 (1981)
107. J. Tihanyi, Integrated Power Devices, IEDM 82, pp. 6-10 (1982)

108. Robert S. Wrathall, David Tam, Louis Terry, Integrated Circuits for the Control of High Power, IEDM 83, pp. 408-411 (1983)
109. Michael Pomper, Ludwig Leipold, Jeno Tihanyi & Hans-Eberhard Longo, IEEE Journal of Solid-State Circuits, Vol. SC-15, No. 3, pp. 328-330 (June 1980)
110. Vladimir Rummennik, David L. Heald, Integrated High and Low Voltage CMOS Technology, IEDM 1982, pp. 77-80 (1982) (Eklund depo. exhibit 32)
111. Bernard DesCamps, Jean-Claude Rufray, Session II: Consumer Circuits WAM 2.3: Integrated High-Voltage Video Amplifier for Color TV, ISSCC 81, pp. 28-29 (February 18, 1981)
112. A.R. Alvarez, R.M. roop, K.I. Ray, G.R. Gettemeyer, Lateral DMOS Transistor Optimized For High Voltage BIMOS Applications, IEDM 83, pp. 420-423 (1983)
113. Walter H.A. Mattheus, Session XVII: Telecommunication Circuits FAM 17.2: 400V Switches for Subscriber Line Interface, ISSCC 81, pp. 238-239 (February 20, 1981)
114. P.L. Hower, T.M.S. Heng, C. Huang, Optimum Design of Power MOSFETS, IEDM 83, pp. 87-90 (1983)
115. Sel Colak, Effects of Drift Region Parameters on the Static Properties of Power LDMOST, IEEE Transactions on Electron Devices, Vol. ED-28, No. 12, pp. 1455-1466 (December 1981) (Bates-labeled as FCS0526755-FCS0526767)
116. H.M.J. Vaes, J.A. Appels, High Voltage, High Current Lateral Devices IEEE 1980, pp. 87-90 (1980) (produced as Bates Nos. FCS1693719-FCS1693724)
117. Power and logic devices are merging on the same chip, Computer Design (August 1984) (KE001518-KE001519 – “Texas BIDFET Approach”)
118. Integrated Circuits Magazine article (March/April 1984) (KE001521-KE001522)

**C. Prior Inventions, Devices, Public Use/On Sale**

119. 400V transistor from NEC (KE001450)
120. 1000V transistor from Tektronix (KE001450)
121. 400V transistor from Philips (KE001450)
122. 200-400V devices for display driving from Sharp (KE001451)
123. 200-400V devices for display driving from Supertex (KE001451)

- 124.200-400V devices for display driving from Siliconix (KE001451)
- 125.200-400V devices for display driving from Telmos (KE001451)
- 126.30-50V display drivers from AMI (KE001451)
- 127.30-50V display drivers from Holt (KE001451)
- 128.Smartpower II D-MOS vertical transistor from Motorola (KE001451)
- 129.Smartpower I device from Motorola (KE001451)
- 130.Proposal from Xerox (KE001451-KE001452)
- 131.200V device from Thompson CSF (KE001452)
- 132.BIDFET technology from Texas Instruments (KE001452)
- 133.Bipolar high voltage transistors combined with low voltage CMOS from Motorola, Analog Devices, Sprauge and Unitrode (KE001452)
- 134.Proposal from Philips (KE001453)
- 135.Proposal from Motorola (KE001453)
- 136.400V switch for subscriber line interface from Bell (KE001453)
- 137.200V Supertex high voltage C-MOS approach for display drivers “open drain” (KE001520, KE001481)
- 138.90V Supertex high voltage C-MOS approach for display drivers “push and pull” (KE001520)
- 139.Integrated DMOS device from SGS (KE001482)
- 140.Lateral DMOS device from General Electric (KE001483)
- 141.250V DMOS in combination with 80 volt bipolar and low voltage CMOS from Texas Instruments (KE001570)
- 142.250V DMOS in combination with 80V bipolar from Thompson (KE001570)
- 143.200V DMOS in combination with low voltage CMOS from Supertex (KE001570)
- 144.100V DMOS in combination with low voltage CMOS from Siliconix (KE001570)

**D. 35 U.S.C. §§ 102(e)/(g) Prior Art (reference is to all pages unless otherwise indicated)**

145. Engineering Notebook of James Douglas Beasom (produced as Beasom Deposition Exhibit 8 (DX130) and documents produced as Bates Nos. I000230-I000234, I000415-I000420) dated August 8, 1979 through June 1985.
146. Notes of James Douglas Beasom (documents produced as Bates Nos. I-000235-I000260) dated February through March 1984.
147. Beasom Test Chips (shown in I-000412, 414) dated August 15, 1985.
148. Notes And Test Data Re Beasom Test Chips (produced as Beasom Deposition Exhibit 9) dated July 18, 1985 through January 13, 1986.
149. Notes, Run Cards And Test Data Re Beasom Test Chips (produced as Beasom Deposition Exhibit 10) dated July-August 1985.
150. Notes, Run Cards and Test Data Re Beasom Test Chips (documents produced as Bates Nos. I000421-I000451, I000452-I000464) dated June-August 1985.
151. Beasom Test Wafers (shown in I-000412-13) created around August 15, 1985.
152. Plot of Beasom Test Wafer (document produced as Bates Nos. I000411) showing test wafer, created around August 15, 1985.
153. Color Magnified Photographs of Beasom Test Wafers (documents produced as Bates Nos. I000465-67) showing test wafer, created around August 15, 1985.

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